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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SHERMAN WILSON an individual; and REBIKA WILSON, an individual,

Plaintiffs,

vs.

BOBBY C. PRATT, JR., an individual; DOES I through X; and ROE CORPORATIONS XI through XX, inclusive.

Defendants.

Case No: 2:23-cv-01425-JCM-BNW

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(Fourth Request)**

Defendant BOBBY C. PRATT, JR., and Plaintiffs SHERMAN and REBIKA WILSON, through their respective counsel, submit the foregoing stipulation and order to extend discovery deadlines pursuant to LR 26-3 as follows:

1. Summary of Discovery Completed

To date, the following discovery has been completed in this case:

Item	Date Completed
Plaintiff's Initial Rule 26(a) Disclosures	10/16/2023
Defendant's Initial Rule 26(a) Disclosures	11/07/2023
Defendant's First Set of Interrogatories, Requests for Admission and Requests for Production to Plaintiffs	11/30/2023
Defendant's First Supplemental Rule 26(a) Disclosures	12/05/2023
Plaintiff Sherman Wilson's responses to Defendant's First Set of Interrogatories, Requests for Production and Requests for Admission	01/16/2024
Plaintiff Rebika Wilson's responses to Defendant's	01/16/2024

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Item	Date Completed
First Set of Interrogatories, Requests for Production and Requests for Admission	
Defendant's Second Supplemental Rule 26(a) Disclosures	04/24/2024
Deposition of Plaintiff Rebika Wilson	04/25/2024
Deposition of Plaintiff Sherman Wilson	04/26/2024
Plaintiff's First Set of Interrogatories, Requests for Admission and Requests for Production to Defendant	05/01/2024
Defendant's Answers to Plaintiff's First Set of Interrogatories, Requests for Admission and Requests for Production	06/14/2024
Defendant's Third Supplemental Rule 26(A)(1) Disclosures	06/14/2024
Deposition of Bobby Pratt, Jr.	08/28/2024

## 2. Discovery Remaining

The following discovery remains to be completed:

- a) Additional Written Discovery;
- b) Deposition(s) of percipient witnesses;
- c) Deposition(s) of treating physicians;
- d) Disclosure of expert witnesses; and
- e) Deposition(s) all expert witnesses.

## 3. Reason Why Discovery Was Not Completed

Discovery in this matter is currently scheduled to close on December 5, 2024 with initial expert disclosures currently due by October 9, 2024. Although discovery has diligently progressed since the Scheduling Order was filed on November 16, 2023, additional time is required to complete discovery. The parties have a mediation scheduled in this matter on October 10, 2024. The parties request this extension to allow sufficient time to disclose expert witnesses after the mediation, if the mediation is unsuccessful. As such, the parties believe that good cause exists to justify extending the discovery deadlines and hereby request a 30 day extension of the discovery deadlines to allow for additional time to complete the remaining discovery.

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4. Proposed Schedule for Completing Discovery

Accordingly, the parties respectfully request that this Court enter an order setting the following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Amend pleadings or add parties	October 9, 2024	November 8, 2024
Expert Designations	October 9, 2024	November 8, 2024
Rebuttal Expert Designations	November 12, 2024	December 12, 2024
Discovery Cut-off	January 6, 2025	February 5, 2025
Dispositive Motions	February 5, 2025	March 7, 2025
Joint Pre-Trial Order	March 6, 2025	April 7, 2025

Counsel further state that the requested extension of discovery deadlines is not interposed for purposes of delay, but rather for the purposes set forth above.

DATED: October 1, 2024

DATED: September 27, 2024

**EDWARD M. BERNSTEIN  
& ASSOCIATES**

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**IT IS SO ORDERED.**

  
 UNITED STATES MAGISTRATE JUDGE

DATED: 10/2/2024

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